

Message

From: Pero, Haley (Sanders) [Haley_Pero@sanders.senate.gov]
Sent: 1/14/2016 5:29:28 PM
To: Brown, Rudy [Brown.Rudy@epa.gov]
Subject: RE: Constituent question on idling

Thanks, Rudy – this is much appreciated.

From: Brown, Rudy [mailto:Brown.Rudy@epa.gov]
Sent: Thursday, January 14, 2016 12:28 PM
To: Pero, Haley (Sanders) <Haley_Pero@sanders.senate.gov>
Subject: FW: Constituent question on idling

Haley, attached below is the e-mail that was sent on December 22. I hope this is helpful. Thanks.

From: Rogan, John
Sent: Wednesday, January 13, 2016 2:38 PM
To: Brown, Rudy <Brown.Rudy@epa.gov>
Subject: FW: Constituent question on idling

This is the response that I had sent to Haley.

John Rogan | Phone 617.918.1645 | Fax 617.918.0645 | rogan.john@epa.gov
5 Post Office Square, Suite 100 | Mail Code: OEP05-2 | Boston, MA 02109-3912

From: Rogan, John
Sent: Tuesday, December 22, 2015 10:26 AM
To: 'Pero, Haley (Sanders)' <Haley_Pero@sanders.senate.gov>
Subject: RE: Constituent question on idling

Good morning Haley –

Please forgive the delay with getting an answer to you. I emailed the EPA Office of Transportation and Air Quality on your behalf and I have been calling on a near daily basis to obtain a clear answer but have not been successful in getting in touch with the subject matter contact; apparently he splits his time between the testing lab and his office.

I will continue to reach out to him, and add any additional information to this response.

1. Why was remote-start technology allowed on the market, when there is a law that EPA must test all new technologies related to emissions before they go on the market?

Remote-start technology is not an emissions control technology so this law does not apply.

2. Are there test procedures for idling, and if so, what are they?

The engine certification testing which is required for all engines that are sold in the US submits the engine to a variety of engine speeds and loads that would be expected under normal use of the engine. Part of this testing would include monitoring the engine under idle speeds and loads. Apart from this larger certification process, I am not aware of a specific test procedure that monitors the engine only under idle speeds.

Also of interest may be the state level regulations limiting unnecessary idling. Contacting the VT Department of Environmental Services would be the best source for additional information on this topic.

Best regards,

John Rogan

John Rogan | Phone 617.918.1645 | Fax 617.918.0645 | rogan.john@epa.gov
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From: Pero, Haley (Sanders) [mailto:Haley_Pero@sanders.senate.gov]
Sent: Friday, December 18, 2015 2:47 PM
To: Rogan, John <Rogan.John@epa.gov>
Cc: Brown, Rudy <Brown.Rudy@epa.gov>; Weinstein, David (Sanders) <David_Weinstein@sanders.senate.gov>
Subject: RE: Constituent question on idling
Importance: High

Hi John,

I know Rudy is out of the office, but he had indicated that you would likely be in touch with information on Monday (12/14).

The constituent is very interested in getting additional information, and I want to be responsive to his request. I know we have been in touch to clarify his requests, but it's been several weeks since his initial request. Could you please send me the information as soon as you are able?

Thanks,
Haley

From: Pero, Haley (Sanders)
Sent: Monday, December 07, 2015 10:08 AM
To: 'rogan.john@epa.gov' <rogan.john@epa.gov>
Cc: 'Brown, Rudy' <Brown.Rudy@epa.gov>; Weinstein, David (Sanders) <David_Weinstein@sanders.senate.gov>
Subject: RE: Constituent question on idling

Hi John,

I have heard back from our constituent a few times, and I wanted to check in on the information you are gathering for him.

Thanks,
Haley

From: Pero, Haley (Sanders)
Sent: Wednesday, November 25, 2015 12:30 PM
To: rogan.john@epa.gov

Cc: Brown, Rudy <Brown.Rudy@epa.gov>; Weinstein, David (Sanders) <David_Weinstein@sanders.senate.gov>

Subject: RE: Constituent question on idling

Hi John,

I know we have spoken since the email exchange below, but I just wanted to check in to get an update. I have heard again from the constituent and would like to get him answers to his questions soon.

Thanks, and best wishes for a happy Thanksgiving.

All the best,
Haley

From: Pero, Haley (Sanders)
Sent: Monday, November 09, 2015 12:12 PM
To: 'Brown, Rudy'
Subject: RE: Constituent question on idling

Hi Rudy,

I just want to check in on this. Any feedback from your team?

All the best,
Haley

From: Pero, Haley (Sanders)
Sent: Thursday, October 29, 2015 11:04 AM
To: 'Brown, Rudy'
Subject: RE: Constituent question on idling

Hi Rudy,

I was able to connect with the constituent who had questions about idling and get more information on his concerns. His specific questions are:

- 1) Why was remote-start technology allowed on the market, when there is a law that EPA must test all new technologies related to emissions before they go on the market?
- 2) Are there test procedures for idling, and if so, what are they? (His concerns are that emissions are greatest after a car has idled for some time and is then driven, and his own testing has shown that some cars will idle as long as 20 minutes with remote-start technology).

As background, this constituent contacted us in 2008 about idling, and we wrote the EPA to get more information for the constituent. The EPA reply indicates that remote-start technology is something that the EPA was interested in evaluating. I have attached the two letters for reference.

Please let me know if you need additional information on the constituent's most recent questions.

Thanks,
Haley

From: Brown, Rudy [<mailto:Brown.Rudy@epa.gov>]
Sent: Thursday, October 08, 2015 4:57 PM

To: Pero, Haley (Sanders)
Subject: Constituent question on idling

Haley, please see the e-mail below regarding idling from John Rogan. I hope it is helpful.

From: Rogan, John
Sent: Thursday, October 08, 2015 4:49 PM
To: Brown, Rudy <Brown.Rudy@epa.gov>
Cc: Conroy, David <Conroy.Dave@epa.gov>; McWilliams, Anne K. <mcwilliams.anne@epa.gov>; Garcia, Ariel <Garcia.Ariel@epa.gov>
Subject: RE: Constituent question on idling

Good afternoon, Rudy –

A far as anti-idling research, there has not been much EPA activity. The general consensus is that unnecessary idling is wasteful from an economic perspective and harmful from an environmental and public health standpoint. Therefore, any efforts have been less focused on research and more focused on anti-idling policy and implementation.

That said, while anti-idling efforts have not been a priority for the Agency, I have touched base with OTAQ and can offer the following:

- Within the Office of Transportation and Air Quality, there is a verification process for privately developed anti-idling technologies. Verified technologies are listed on the SmartWay website here: <http://www3.epa.gov/smartway/forpartners/technology.htm>. The list is amended as new technologies are verified;
- Verified anti-idling technologies are eligible for funding under programs such as the Diesel Emissions Reduction Act (DERA). More info information on DERA can be found at <http://www2.epa.gov/cleandiesel>;
- There is a school bus anti-idling program in its preliminary stages lead by Cindy Huang in the D.C. OTAQ office;
- A brief report was issued in October, 2008 on “Idling Vehicle Emissions for Passenger Cars, Light-Duty Trucks, and Heavy-Duty Trucks”. It is available for review here: <http://www3.epa.gov/otaq/consumer/420f08025.pdf>.

External to the EPA, the Ozone Transport Commission Mobile Source Committee, which the EPA participates on, recently surveyed the States to gauge the anti-idling efforts currently in place. The EPA has worked with states to establish anti-idling laws, and most states in the Ozone Transport Region have some form of anti-idling regulation. Attached is a spreadsheet outlining these efforts. As you will see, there are many anti-idling laws and efforts that states have put in place for heavy-duty diesel vehicles and school buses. There are also policies specific to areas near school grounds, parking lots, and/or passenger drop-off areas.

Regarding remote start technology, most OEM remote starter technology will automatically shut the vehicle engine off when the vehicle has been idling for an excessive amount of time (approximately 8-10 minutes). Although I do not think this was a federal requirement, and after-market remote starters may not have this feature.

I would also add, that the Department of Energy (DOE) and the Office of Energy Efficiency & Renewable Energy (OEERE) have their own anti-idling efforts. More information can be found on the DOE’s efforts at http://www.afdc.energy.gov/conservation/idle_reduction_research.html. The efforts at OEERE appear to have more of a research and development component. Their website can be found here: <http://energy.gov/eere/vehicles/vehicle-technologies-office>.

Please do not hesitate to contact me if you need further assistance.

Best regards,

John

John Rogan | Phone 617.918.1645 | Fax 617.918.0645 | rogan.john@epa.gov
5 Post Office Square, Suite 100 | Mail Code: OEP05-2 | Boston, MA 02109-3912

From: Pero, Haley (Sanders) [mailto:Haley_Pero@sanders.senate.gov]
Sent: Monday, October 05, 2015 4:07 PM
To: Brown, Rudy <Brown.Rudy@epa.gov>
Subject: Constituent question on idling

Hi Rudy,

I have heard from a constituent who wants more information on idling. He feels that EPA hasn't done anything with their research on idling, and he is also concerned that remote start cars aren't regulated.

I have a call into him to get more specifics on his questions. I have also taken a look at EPA's materials on idling.

If you have any thoughts on the issue he is raising in the meantime, please let me know.

Thanks,
Haley

Haley Pero
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